UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

JAMAAL CAMERON; RICHARD BRIGGS; RAJ LEE; MICHAEL CAMERON; MATTHEW SAUNDERS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his official capacity as Sheriff of Oakland County; CURTIS D. CHILDS, in his official capacity as Commander of Corrective Services; OAKLAND COUNTY, MICHIGAN,

Defendants.

Case No. 20-cy-10949

Hon. Linda V. Parker

AMENDMENT TO STIPULATED ORDER REGARDING DISCIPLINARY TRANSFERS AT THE OAKLAND COUNTY JAIL DURING THE PENDENCY OF THE INSTANT LITIGATION

The Court has reviewed and considered Plaintiffs' Motion to Enforce the Stipulated Agreement ("Stipulation") entered on April 22, 2020 (ECF 28). The Court instructed the parties to work together to develop a proposed solution to the issues raised in Plaintiffs' motion, and the parties have done so and submitted a proposed stipulated order to the Court. On May 29, 2020, this Court entered a Stipulated Order Regarding Disciplinary Transfers (ECF 110). Subsequently the parties submitted a proposed Amended Stipulated Order Regarding Disciplinary

Transfers. Upon Stipulation of the parties, the Court Amends the Stipulated Order Regarding Disciplinary Transfers and **ORDERS** as follows:

- 1. Under no circumstances will Defendants or any jail personnel effect (or threaten to effect) a transfer, for disciplinary reasons, of any inmate into a quarantined area as defined below.
- 2. Any disciplinary movement of an inmate will be to a "non-quarantined area" defined as movement to an entire cell block in which no cell is under quarantine at the time of transfer. However, if two or more cell blocks contain quarantined cells, then "non-quarantined area" is defined as movement to a row of cells in a cell block in which no cell in the row is under quarantine at the time of transfer. Upon request of class counsel, a list of quarantined cells will be provided to verify compliance with this step.
- 3. Inmates can also be moved for reasons of documented medical necessity, pursuant to the same process.
- 4. Defendants will provide class counsel with a weekly list, submitted via email at the end of each week, detailing all transfers including the following: 1) the name of the inmate; 2) the inmate number; 3) the inmate's pre-transfer housing assignment; and 4) the inmate's post-transfer housing assignment.
 - 5. This stipulated order will remain in effect only during the pendency of

the instant litigation.

IT IS SO ORDERED.

s/ Linda V. Parker
LINDA V. PARKER
U.S. DISTRICT JUDGE

Dated: January 26, 2021

The Parties stipulate to the above order.

/s/ Thomas B. Harvey

Thomas B. Harvey (MBE #61734MO) Advancement Project National Office 1220 L Street, N.W., Suite 850 Washington, DC 20005 Tel: (202) 728-9557 Ksanthanam@advancementproject.org Tharvey@advancementproject.org

/s/ Philip Mayor

Philip Mayor (P81691)
Daniel S. Korobkin (P72842)
American Civil Liberties Union
Fund of Michigan
2966 Woodward Ave.
Detroit, MI 48201
(313) 578-6803
pmayor@aclumich.org
dkorobkin@aclumich.org

/s/ Alexandria Twinem
Alexandria Twinem
(D.C. Bar No. 1644851)

Respectfully submitted,

/s/ Cary S. McGehee

Cary S. McGehee (P42318) Kevin M. Carlson (P67704) Pitt, McGehee, Palmer, Bonanni & Rivers, PC 117 W. Fourth Street, Suite 200 Royal Oak, MI 48067 (248) 398-9800 cmcgehee@pittlawpc.com kcarlson@pittlawpc.com

/s/ Allison L. Kriger_

Allison L. Kriger (P76364) LaRene & Kriger, PLC 645 Griswold, Suite 1717 Detroit, MI 48226 (313) 967-0100 Allison.kriger@gmail.com Civil Rights Corps 1601 Connecticut Ave NW, Suite 800 Washington, DC 20009 (202) 894-6126 alexandria@civilrightscorps.org

Attorneys for Plaintiffs/Petitioners

s/STEVEN M. POTTER (P33344)
POTTER, DeAGOSTINO, O'DEA & CLARK
Attorneys for Defendants
2701 Cambridge Court, Suite 223
Auburn Hills, Michigan 48326
(248) 377-1700
spotter@potterlaw.com